

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LISA PENNICK,

Plaintiff,

V.

05-cv-11060-WGY

MICHELLE GRENNON, GRENNON
DESIGN

Defendants.

PLAINTIFF'S INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and Local Rule 26.2, Plaintiff Lisa Pennick hereby provides the following initial disclosures.

1. The following is a list of individuals likely to have discoverable information that Plaintiff may use to support her claims, excluding information that may be used solely for impeachment.

1. Jay Acari
Landry & Acari
3 Pleasant Street
Salem, MA 01970
(978) 755-5909

Mr. Acari has information about Ms. Pennick's role in the New Castle Project

2. Jeff Acari
Landry & Acari
3 Pleasant Street
Salem, MA 01970
(978) 755-5909

Mr. Acari has information about Ms. Pennick's role in the New Castle Project

3. Ben Auger
Auger Building Company
Portsmouth, NH

Mr. Auger has information about Ms. Pennick's role in the New Castle Project

4. Paula Bevaqua
48 Cleveland Ave.
Saugus, MA 019006
(781) 231-7400

Ms. Bevaqua has information about Ms. Pennick's role in the New Castle Project

5. Ellen
Auger Building Company
Portsmouth, NH

Ellen has information about Ms. Pennick's role in the New Castle Project

6. Sarah Fawcett
Webster & Co. (former employee)
Weston, MA

Ms. Fawcett has information about Ms. Pennick's role in the New Castle Project

7. Gail Gilbrato
15 Green Street
Wakefield, MA 01880
(781) 246-1310

Ms. Gilbrato has information about the Kitchen Show and the cancellation of plans to film a segment on the New Castle Project

8. Michael Gillick
Urban Archaeology
One Design Center Place
Suite 342
Boston, MA 02210
(617) 737-4646

Mr. Gillick has information about Ms. Pennick's role in the New Castle Project

9. Nicole Goldman
77 Sudbury Road
Concord, MA 01742
(978) 369-2757

Ms. Goldman has information about the article in Accent Home & Garden Magazine about the New Castle Project

10. Erin Harris
Former assistant to Ms. Grennon
Charlotte, NC

Ms. Harris has information about Ms. Pennick's role in the New Castle Project

11. Sheree Hopkins
Granite State Kitchens
Bedford, NH

Ms. Hopkins has information about Ms. Grennon's role in the New Castle Project

12. David Ives
4 Westport Lane
Marblehead, MA 01945
(781) 631-1428

Mr. Ives has information about Ms. Pennick's role in the New Castle Project

13. Pam Ives
4 Westport Lane
Marblehead, MA 01945
(781) 631-1428

Ms. Ives has information about Ms. Pennick's role in the New Castle Project

14. Karine Jouenne
Soft Walls Associates
535 Albany Street
Boston, MA 02118
(617) 482-5498

Ms. Jouenne has information about Ms. Pennick's role in the New Castle Project

15. John Kenney
HomeWorks Sourcebook
399 Boylston St.
Boston, MA 02116
(617) 292-7320

Mr. Kenney has information about Ms. Grennon's application for the Luxury Living Awards

16. Lucy Arsnow Leak
Baker, Knapp & Tubbs
One Design Center Place
Suite 300
Boston, MA 02210
(617) 439-4876

Ms. Leak has information about Ms. Pennick's role in the New Castle Project

17. Doris Leonhards
Leonhards Florist
Corning Street
Beverly, MA 01915
(978) 922-4295

Ms. Leonhards has information about Ms. Pennick's role in the New Castle Project

18. Gary Martin
The Martin Group
One Design Center Place
Suite 505
Boston, MA 022210
(617) 951-2526

Mr. Martin has information about Ms. Pennick's role in the New Castle Project

19. Suzanne Matteson
10 Waldron Street
Marblehead, MA 01945
(617) 899-1424

Ms. Matteson has information about Ms. Pennick's role in the New Castle Project

20. Brendan McNamara
19 Doe Drive
Eliot, ME 03903

Mr. McNamara has information about Ms. Pennick's role in the New Castle Project

21. Patricia Mullaney
Bygone's of Ireland
89 Canal Street
Salem, MA 01970
(978) 745-4990

Ms. Mullaney has information about Ms. Pennick's role in the New Castle Project

22. Sandy Newman
11 Euclid Street
Marblehead, MA 01945
(781) 631-1435

Ms. Newman has information about events that occurred after Plaintiff finished working on the New Castle Project

23. Sandy Norton
40 Cloutman's Lane
Marblehead, MA 01945
(781) 929-1282

Mr. Norton has information about correspondence regarding the Luxury Living Awards

24. Maureen Palmer
64 Nanapashmet Street
Marblehead, MA 01945
Home (781) 639-8239

Ms. Palmer has information about events that occurred after Plaintiff finished working on the New Castle Project

25. Nigel Palmer
64 Nanapashmet Street

Marblehead, MA 01945
Home (781) 639-8239

Mr. Palmer has information about events that occurred after Plaintiff finished working on the New Castle Project

26. Bernie Pine
Landry & Acari
3 Pleasant Street
Salem, MA 01970
(978) 755-5909

Mr. Pine has information about Ms. Pennick's role in the New Castle Project

27. Gayle Reynolds
7 Fessenden Way
Lexington, MA 02420
(781) 861-9712

Ms. Reynolds has information about Ms. Grennon's role in the New Castle Project

28. Gary Riegel
Boston Design Center
One Design Center Place
Boston, MA 02210
(617) 338-5062

Mr. Riegel has information about Ms. Pennick's role in the New Castle Project

29. Gretchen Schwilk
Steven King, Inc.
One Design Center Place
Suite 405
Boston, MA 02210
(617) 426-3302

Ms. Schwilk has information about Ms. Pennick's role in the New Castle Project

30. Elisabeth Talbot
41 Black Rock Drive
Hingham, MA 02254
Home (781) 749-9822

Ms. Talbot has information about events that occurred after Plaintiff finished working on the New Castle Project

31. Christina Tassi
HomeWorks Sourcebook
399 Boylston St.
Boston, MA 02116
(617) 292-7320

Ms. Tassi has information about Ms. Grennon's application for the Luxury Living Awards

32. Linda Taylor
Portsmouth, NH

Ms. Taylor has information about Ms. Pennick's role in the New Castle Project

33. David Webster
Webster & Company
One Design Center Place
Suite 144
Boston, MA 02210
(617) 261-9660

Mr. Webster has information about Ms. Pennick's role in the New Castle Project

Employees working at the following stores or showrooms, names or full names currently unknown, have information about Ms. Pennick's role in the New Castle Project

1. Beacon Hill Showrooms
One Design Center Place
Suite 200
Boston, MA 02210
(617) 482-6600
2. April
Boston Stone (no longer in business)
Hawaii (currently)
3. Chris
Old World Weavers
Boston Design Center
Boston, MA 02210

4. Comina
Atlantic Avenue
Marblehead, MA 01945
5. Devon Service
Boston Design Center
Boston, MA 02210
(617) 428-0033
6. Donna
McLaughlin Upholstering Company, Inc.
1813 Revere Beach Parkway
Everett, MA 02149
(617) 389-0761
7. Erika
Steven King, Inc.
One Design Center Place
Suite 405
Boston, MA 02210
(617) 426-3302
8. Essex Antique shop
Essex, MA
9. Haley & Steele
91 Newbury Street
Boston, MA
10. Jeffrey
Urban Archeology
The Boston Design Center
Suite 342
Boston, MA 02210
(617) 737-4646
11. Jim
Berkeley House
Boston Design Center
Boston, MA 02210
(617) 451-6874
12. Jorgersons Antiques
Wells, Maine
(207) 646-9444

13. Kevin
Blanche P. Field LTD
One Design Center Place
Suite 336
Boston, MA 02210
(617) 423-0715
14. Landry Antiques
Essex, MA 01929
15. Lily
Reliable Fabrics
P.O. Box 6176
Chelsea, MA 02150
(800) 682-4567
16. Paul
Muldoon Trucking
40 Robbie Road
Avon, MA 02322
(508) 588-8600
17. Prides Crossing Upholster
153 Western Ave.
Essex, MA 01929
(978) 768-7555
18. Scalamandre
Boston Design Center
Boston, MA 02210
(617) 574-9261
19. Window Treats
Boston Design Center
Boston, MA 02210
(617) 439-9492
20. Wendy
The M-Geough Company, Inc.
One Design Center Place
Suite 515
Boston, MA 02210
(617) 451-1412

2. The following is a description of documents in the possession, custody or control of Plaintiff that may be used to support her claims, excluding documents that may be used solely for impeachment. All documents are in the possession of the Plaintiffs' counsel.

- a. Correspondence regarding Luxury Living Awards
- b. Print-outs from www.homeworkssourcebook.com
- c. Notes, invoices and receipts regarding the New Castle Project
- d. Accent Home & Garden Magazine dated January/February 2005
- e. Photographs of 28 Beach Hill Road, New Castle, NH in print and on CD-ROM
- f. Postcard from Michelle Grennon re: March 12, 2005 event
- g. Pamphlet regarding Luxury Living Awards

3. The Plaintiff seeks rescission of, or damages resulting from, Defendants' conduct in wrongfully taking credit for interior design work done by Plaintiff, breaching Defendants' contract with Plaintiff, unfairly competing with Plaintiff, as well as for defamation and violation of copyright. Plaintiff also seeks attorney fees and costs and expenses. Plaintiff will make available for inspection and copying all documents in her possession bearing on these claimed damages to the extent such documents are not privileged or otherwise protected from disclosure.

4. The Plaintiff has in her custody, possession or control no insurance agreements that may satisfy all or part of a judgment in this matter.

The Plaintiff reserves the right to supplement these disclosures.

/s/ Jacob T. Elberg
Thomas E. Dwyer, Jr. (BBO # 139660)
David A. Bunis (BBO # 550570)
Jacob T. Elberg (BBO # 657469)
Dwyer & Collora, LLP
600 Atlantic Avenue
Boston, MA 02210-2211
(617) 371-1000
(617) 371-1037 (fax)

Dated: August 5, 2005

Certificate of Service

I, Jacob T. Elberg, hereby certify that a true copy of the above document was served via electronic transmission upon counsel for defendants, Eric M. Summers.

/s/ Jacob T. Elberg
Jacob T. Elberg